## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

E.I. du PONT de NEMOURS AND	)
COMPANY,	)
Plaintiff,	)
v.	) Civil Action No. 3:09CV00058
KOLON INDUSTRIES, INC.,	)
Defendant.	)
	)

## PLAINTIFF E.I. du PONT de NEMOURS & COMPANY'S MOTION FOR ASSET FREEZE

Plaintiff E. I. du Pont de Nemours and Company ("DuPont"), by counsel, for the reasons set forth in the accompanying memorandum, respectfully moves the Court to freeze the assets of Kolon Industries, Inc. ("Kolon"). Specifically, 1) the jury in this matter found that Kolon misappropriated 149 of DuPont's trade secrets willfully and with malice; 2) this Court is authorized to enjoin Kolon's dissipation or transfer of assets; and 3) an asset freeze injunction is necessary to prevent Kolon from dissipating assets or secreting them outside of the United States. The grounds in support of this Motion and the specific relief sought are set forth in detail in the accompanying memorandum.

Dated: September 16, 2011	Respectfully submitted,
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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of September, 2011, I served the foregoing via the Court's CM/ECF system on:

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